

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

ANTHONY E. HEINDL JR.)	CHAPTER 13
Aka ANTHONY E. HEINDL)	
DEBTOR)	
)	
)	CASE NO. 1:20-bk-01345-HWV
M & T BANK)	
Movant)	
)	
)	
vs.)	
)	
)	
ANTHONY E. HEINDL JR.)	
Aka ANTHONY E. HEINDL)	
DEBTOR)	
)	
)	
JACK N. ZAHAROOULOS)	
TRUSTEE)	

**DEBTOR'S RESPONSE TO M & T BANK'S MOTION FOR RELIEF FROM THE
AUTOMATIC STAY UNDER SECTION 362**

1. Movant, M & T Bank filed its Motion for Relief from Stay on March 6, 2023.
2. Debtor acknowledges some mortgage payments are past due.
3. Debtor desires the opportunity to cure any post-petition mortgage arrears and keep his home.

4. Debtor requests the Court deny Movant's Motion for Relief.

WHEREFORE, Debtor, Anthony E. Heindl, Jr. prays the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed March 6, 2023, by M & T Bank.

Dated: March 20, 2023

/s/Nicholas G. Platt
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